

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**MWK RECRUITING, INC.
Plaintiff,**

v.

**EVAN P. JOWERS, YULIYA
VINOKUROVA, ALEJANDRO VARGAS,
and LEGIS VENTURES (HK) COMPANY
LIMITED (aka Jowers / Vargas),
Defendants.**

Civil Action No. 1:18-cv-00444

EVAN P. JOWERS

Counterclaimant,

v.

**MWK RECRUITING, INC., ROBERT E.
KINNEY, MICHELLE W. KINNEY,
RECRUITING PARTNERS GP, INC.,
KINNEY RECRUITING LLC, COUNSEL
UNLIMITED LLC, and KINNEY
RECRUITING LIMITED**

Counter-defendants.

**DECLARATION OF ROBERT TAULER IN SUPPORT OF EVAN P. JOWERS'S
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. SECTION 1404(A)**

DECLARATION OF ROBERT TAULER

I, Robert Tauler, hereby declare as follows:

1. I am counsel of record for Evan P. Jowers in this action. I have personal knowledge of the facts stated in this declaration, and if called as a witness, could and would testify competently to the truth of the facts as stated herein.

2. Attached hereto as Exhibit A is a true and correct copy of a letter sent from Robert Kinney to the Western District of Texas Attorney Admission Committee, dated September 30, 2020.

3. Attached hereto as Exhibit B is a true and correct copy of portions of an email from Gary Zausmer to the members of the Western District of Texas Attorney Admission Committee, dated February 25, 2021.

4. On August 30, 2021, my assistant reviewed the Federal Court Management Profiles for the Western District of Texas and for the Southern District of Florida located on the website of the Administrative Office of the U.S. Courts, located at <http://www.uscourts.gov/Statistics.aspx>, to determine the amount of pending cases per judgeship for each district. According to the Administrative Office of the U.S. Courts, the pending cases per judge in the Western District of Texas was 749 as of June 30, 2021. It was 378 in the Southern District of Florida as of the same date.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at Los Angeles, California on August 31, 2021.

/s/ Robert Tauler
Robert Tauler

CERTIFICATE OF SERVICE

I hereby certify that, on August 31, 2021, a true and accurate copy of the foregoing document was served on all counsel of record via the Court's CM/ECF system.

/s/ Robert Tauler
Robert Tauler